

# ***De Minimis Update***

**January 28, 2020**

# De Minimis Customer Update

- BPA has reviewed customer comments received to date.
- In response to customer feedback, BPA is developing an internal agency decision framework (ADF) to identify *de minimis* alternatives for further consideration.
- In the spirit of transparency, we are sharing a draft list of the policy alternatives identified at a high-level.
- We plan to continue to engage customers as we develop and later evaluate the alternatives.

# Draft ADF Alternatives

- **Alternative 1.** Status Quo. Apply *de minimis* test 1 to both ST and LT redirects. Apply *de minimis* test 2, only to LT redirects.
- **Alternative 2.** Align ST *de minimis* with LT *de minimis* test (i.e., test 1 and test 2 are both applied to ST).
- **Alternative 3.** Same as Alternative 2, establish a different threshold for ST redirects.
- **Alternative 4.** For the ST redirect, apply a *de minimis* test based on the net PTDF impact. The net impact is the redirect PTDF minus the parent PTDF. Establish a new threshold for acceptable net impacts. No change to LT redirects.
- **Alternative 5.** Establish a cumulative limit for *de minimis* impacts. This alternative would not apply to status quo but it is complementary to all other alternatives

# Next Steps

- February 6 customer WebEx
  - Technical description of draft alternatives
- March 17 customer meeting
  - Share Objective and Principles
  - Share updated list of Alternatives – current list is not exhaustive and is subject to change